

1 DAVID B. LEVANT (*pro hac vice*)
david.levant@stoel.com
2 JENNIFER L. MERSING (*pro hac vice pending*)
jennifer.mersing@stoel.com
3 JENNIFER N. SLOCUM (*pro hac vice*)
jennifer.slocum@stoel.com
4 STOEL RIVES LLP
600 University Street, Suite 3600
5 Seattle, WA 98101
Telephone: 206.624.0900
6 Facsimile: 206.386.7500

7 *Attorneys for Avangrid Renewables, LLC, et al.,*
Enel Green Power North America, Inc. et al. and
8 *Enel X, Capital Dynamics, Inc. et al., FTP Power*
LLC, et al., Gill Ranch Storage, LLC,
9 *Project Mustang, and sPower*

10
11
12 UNITED STATES BANKRUPTCY COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 In re:

16 PG&E CORPORATION

17 - and -

18 PACIFIC GAS AND ELECTRIC
19 COMPANY,

Debtors.

- 20 ☐ Affects PG&E Corporation
21 ☐ Affects Pacific Gas and Electric
Company
22 ☒ Affects both Debtors

23 **All papers shall be filed in the Lead Case,*
24 *No. 19-3088 (DM)*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

APPLICATION FOR ADMISSION OF
ATTORNEY *PRO HAC VICE*

25 Pursuant to B.L.R. 1001-2(a) and Civil L.R. 11-3, Jennifer L. Mersing, an active member
26 in good standing of the bar of the State of Washington, the bar of the State of New York, and the
27 bar of the District of Columbia, hereby applies for admission to practice in the Bankruptcy Court
28

1 for the Northern District of California on a *pro hac vice* basis representing each of Avangrid
2 Renewables, LLC, et al.¹, Enel Green Power North America, Inc. et al. and Enel X², Capital
3 Dynamics, Inc. et al.³, FTP Power LLC, et al.⁴, Gill Ranch Storage, LLC, Project Mustang⁵, and
4 sPower⁶ in the above-entitled action.

5 In support of this application, I certify on oath that:

- 6 1. I am an active member in good standing of a United States Court or of the highest
7 court of another State and the District of Columbia, as indicated above;
- 8 2. I agree to abide by the Standards of Professional Conduct set forth in Local Rule
9 11-4, and agree to become familiar with the Local Rules and the Bankruptcy Dispute
10 Resolution Program of this Court; and,
- 11 3. An attorney who is a member of the bar of this Court in good standing and who
12 maintains an office within the State of California has been designated as co-counsel
13 in the above-entitled action. The name, address and telephone number of that
14 attorney is:

15 Sunny S. Sarkis (#258073)
16 STOEL RIVES LLP
17 500 Capitol Mall, Suite 1600
18 Sacramento, CA 95814
19 Telephone: 916.447.0700

20 I declare under penalty of perjury that the foregoing is true and correct.

21 DATED: October 15, 2019.

22 /s/ Jennifer L. Mersing
23 Jennifer L. Mersing

24 ¹ This representation includes the following subsidiaries of Avangrid Renewables, LLC, et al.: Klondike Wind Power III LLC and
25 Shiloh I Wind Project LLC.

26 ² This representation includes the following subsidiaries of Enel Green Power North America, Inc., et al. and Enel X: Sierra
27 Energy Storage, LLC, Kingston Energy Storage, LLC, Cascade Energy Storage, LLC, El Dorado Hydro, LLC, and Rock Creek
28 Hydro, LLC.

³ This representation includes the following subsidiaries of Capital Dynamics, Inc., et al.: CA Flats Solar 130, LLC, CA Flats
Solar 150, LLC, Lost Hills Solar, LLC, Blackwell Solar, LLC, Parrey, LLC, North Star Solar, LLC, and Solar Star California
XIII, LLC.

⁴ This representation includes the following subsidiaries of FTP Power LLC, et al.: Western Antelope Blue Sky Ranch A LLC,
87RL 8me LLC, Aspiration Solar G LLC, Bayshore Solar A, LLC, Bayshore Solar B, LLC, and Bayshore Solar C, LLC.

⁵ This representation includes the following subsidiaries of Project Mustang: RE Mustang LLC, RE Mustang 3 LLC, and RE
Mustang 4 LLC.

⁶ This representation includes the following subsidiaries of sPower: Adera Solar, LLC, 65HK 8ME, LLC, 67RK 8ME, LLC, and
87RL 8ME, LLC.

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION)	BAR NO. 50752
)	
OF)	CERTIFICATE
)	
JENNIFER LYNN MERSING)	OF
)	
TO PRACTICE IN THE COURTS OF THIS STATE)	GOOD STANDING
)	

I, Susan L. Carlson, Clerk of the Supreme Court of the State of Washington, hereby certify

JENNIFER LYNN MERSING

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on May 24, 2016, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.



IN TESTIMONY WHEREOF, I have
hereunto set my hand and affixed
the seal of said Court this 9th day of
September, 2019.

A handwritten signature in cursive script, reading "Susan L. Carlson".

Susan L. Carlson
Supreme Court Clerk
Washington State Supreme Court



State of New York
Supreme Court, Appellate Division
Third Judicial Department

I, Robert D. Mayberger, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

Jennifer Lynn Mersing

having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Law in all courts of the State of New York on the 22nd day of January, 2009, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixty-eight-a of the Judiciary Law.

In Witness Whereof, I have hereunto set my hand and affixed the Seal of said Court, at the City of Albany, this 9th day of September, 2019.



Robert D Mayberger

Clerk



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,
the District of Columbia Bar does hereby certify that

Jennifer Lynn Mersing

was duly qualified and admitted on September 11, 2009 as an attorney and counselor entitled to
practice before this Court; and is, on the date indicated below, an Active member in good
standing of this Bar.

In Testimony Whereof,
I have hereunto subscribed my
name and affixed the seal of this
Court at the City of
Washington, D.C., on
September 6, 2019.

Julio A. Castillo

JULIO A. CASTILLO
Clerk of the Court

[Signature]

Issued By:
District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email
memberservices@dcbar.org.